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June 23, 2003

VIA FACSIMILE AND U.S. FIRST-CLASS MAIL

Thomas Olson, Esquire Wilmer, Cutler & Pickering 2445 M Street, N.W. Washington, D.C. 20037-1420

> Russian Research Center, the Kurchatov Institute v. Western Services Corporation

Dear Mr. Olson:

I respond to your letter of June 20, 2003.

Services concerns Western referenced case The Corporation's misappropriation of the Kurchatov Institute's ("KI") intellectual property, and its sale of the same, with DS&S and SAIC, to what is apparently a large number of entities across the country. KI is entitled to know what was sold to these entities, what representations were made with respect to the product and its ownership, what updates and additional versions were presented to the customers, and the communications between the selling entity and the customers with respect thereto, among other things. subpoenas quite obviously were one effort directed toward developing this evidence.

We accept your suggestion that DS&S and SAIC may have information relevant to this lawsuit, and you can expect subpoenas to be served upon them very shortly. However, particularly under the circumstances of this case, We believe that the finder of fact will greatly benefit from comparing DS&S's and SAIC's anticipated testimony as to its representations and other communications with the customers regarding the infringing software, and that received from

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the customers themselves (among other things). Obviously, there is no way that DS&S and SAIC could present the finder of fact with an accurate and credible comparison of the testimony, and neither could anyone else, unless the purchasing entity's testimony is obtained. Moreover, much of the information sought from the purchasing entities is information only they possess; for example internal communications regarding the software and joint funding information between the purchasing entities and third parties.

Therefore, for these and other reasons, it would be inappropriate of me to agree with you to limit KI's access to evidence that goes to the very heart of the dispute between the parties.

Should you wish to discuss any other aspect of this matter, however, please feel free to give me a call.

Sincerely,

John M.G. Murph

JMGM/mck